



September 30, 2004

TO: Tracie Billington, Department of Water Resources

RE: Comments on Draft Guidelines, Proposition 50 Chapter 8

The Los Angeles and San Gabriel Rivers Watershed Council is pleased to provide our comments to the Department of Water Resources on the grant guidelines for Proposition 50 Chapter 8. In general, we feel the guidelines are reasonable and have incorporated many of the concerns raised during the scoping process. We have two main concerns about the application and evaluation process.

Chapter 8 states that a project must be *consistent with* an adopted IRWMP. We feel that the guidelines have made a shift from implementation of projects consistent with a plan, to those that *implement* the plan, and thus any projects proposed for funding would need to be listed in the plan. We disagree with this notion. There are many potential projects that may be consistent with an adopted plan without being explicitly listed in the plan. To restrict eligible projects to only those listed in a plan could exclude a number of entities, such as non-profits, from funding consideration even though their projects may explicitly meet the goals of an IRWMP, may meet the multiple benefits listed in Ch. 8, and be supported by multiple agencies.

Our second comment relates to an intention not yet incorporated into the guidelines but which may be included in the final version. It was expressed at the August 31st workshop that the intent of the grant application process was for one application to be submitted for any given IRWMP, with any number of projects included. Thus one agency would take the lead on the proposal, with a suite of projects from the IRWMP that could be implemented by the lead agency or by other entities, and with the lead agency responsible for the administration of all projects. While we strongly support the promotion of integrated regional planning, limiting the application to one per plan may result in actually discouraging such planning in larger regions. The administrative burden may be a disincentive to including projects carried out by other entities, and instead may encourage lead agencies to favor their own projects. It may also result in IRWMPs being developed for smaller regions thus subverting the intent of the legislation. We would instead suggest that logical sub-regions within the IRWMP area, such as sub-watersheds, be allowed to submit applications for projects in each sub-region provided that they meet other required criteria.

Thank you for the opportunity to comment on the grant guidelines for Prop 50 Chapter 8. We commend the efforts of both DWR and Resources staff to incorporate public input in developing these guidelines.